

Integrated System Procedures

Legionella Control Association Statement of Compliance



Procedure No: IP-028

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The services offered by HBE (Healthy Built Environment) under the scope of this code of conduct are limited to:

1. Risk Assessment Services
3. Hot and Cold Water Monitoring and Inspection Services
4. Cleaning and Disinfection Services
5. Independent Consultancy Services
6. Training Services
7. Legionella Analytical Services

1. Allocation of Responsibilities

(a) HBE explains in detail the client's obligations under the Legionellosis Legislation i.e.

NI Legislation

- Health & Safety at Work Order (NI) 1978 (as amended 2000)
- Management of Health & Safety at Work Regulations (NI) 2000 as amended 2003 & 2006
- Control of Substances Hazardous to Health Regulations (NI) 2003 as amended 2005
- CIBSE TM13 – Minimising the risk of Legionnaires' Disease
- HSE document L8 (Fourth edition) – Legionnaires Disease, The control of legionella bacteria in water systems: Approved Code of Practice and Guidance on Regulations.
- HSE document HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems.
- HSE document HSG274 Part 2 - The control of legionella bacteria in hot and cold water systems.
- HSE document HSG274 Part 3 - The control of legionella bacteria in other risk systems.
- BS8558:2015 - Design, Installation, Testing & Maintenance of services supplying water for domestic Use within buildings and their curtilages.
- BS PD855468:2015 - Guide to Flushing Disinfection of Services for Domestic Use Within Buildings
- UK HSG220 – Health and Safety in Care Homes
- UK HSG282 - 2017 The control of legionella and other infectious agents in spa-pool systems

ROI Legislation

- Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005)
- Safety, Health and Welfare at Work (General Application) Regulations, 2007 (S.I. No. 299 of 2007)
- Safety, Health and Welfare at Work (Biological Agents) Regulations 2013 (S.I. No. 572 of 2013)
- Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001, as amended in 1998 (S.I. No. 619 of 2001)
- National Guidelines for the Control of Legionellosis in Ireland, 2009
- Guidelines for the Prevention and Control of Infection from Water Systems in Healthcare Facilities, Published by Health Protection Surveillance Centre (HPSC), 2015.

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UK Legislation

- Health & Safety at Work etc. Act 1974
- The Management of Health & Safety at Work Regulations 1999 as amended 2003 & 2006
- The Control of Substances Hazardous to Health Regulations 2002 as amended 2003 & 2004
- CIBSE TM13 – Minimising the risk of Legionnaires' Disease
- HSE document L8 (Fourth edition) – Legionnaires Disease, The control of legionella bacteria in water systems: Approved Code of Practice and Guidance on Regulations.
- HSE document HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems.
- HSE document HSG274 Part 2 - The control of legionella bacteria in hot and cold water systems.
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This is detailed in IP - 024 Legionella Account Management. This procedure covers the handling of all enquiries received by the company, the preparation and submission of tenders and quotations, and the method of reviewing all orders, whether written or verbal, received by the company to ensure that all aspects of the estimating and tendering process are carried out in a controlled manner that maximises the company's chances of a successful appointment right through to the completed job. It also includes a brief description of the basis of legionella infection, discussion of the ACOP L8 and HSG 274 and the Client's responsibility with respect to the ACOP.

- (b) HBE will identify those services covered by HBE contract and those which will be provided by the client in order to meet all current obligations as detailed in IP-024 Legionella Account Management and the associated Legionella Quotation Templates.

- HBE Contract Review & Legionella Pre-Work Survey Document,
- HBE Legionella Management Quotation,
- HBE Legionella Risk Assessment Quotation,
- HBE Legionella Remedial Quotation,
- HBE Legionella Clean & Disinfection Quotation,

The quotations will be submitted to the client after agreement from them as to which services they would like HBE to provide (HBE will discuss all what is required in order to comply with legislation applicable to the country and specific region), it will list the services that HBE will cover under the contract and those that the client will be responsible for, this will form part of the formal agreement.

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- (c) HBE has a formal written agreement using the Legionella Quotation Templates listed above which are part of the Account Management CRM system, this formal agreement with the client details the respective responsibilities for each requirement. The client receives a copy, authorises and returns a copy to acknowledge agreement. This is for all services provided by HBE under the scope of this code of conduct.

2. Training and Competence of Personnel

- a) HBE is currently registered as an ISO 9001:2008 Quality Supplier. This requires all staff to have a formal training program which includes Legionella Training (IF-161) containing individual training records all of which refer to the Code of Conduct and are annually reviewed by the HR Officer; this training is detailed in the Procedure – Legionella Training Awareness and Competence (IP-027). This provides opportunity to highlight any training requirements which are discussed as part of the Management Meetings.
- b) HBE has a Legionella Competence Audit (IF-169 Legionella Surveyor Audit Form, IF-097 Legionella Technician Audit Form and IF-097 Legionella Technician Audit Sheet). There is a system in place to assess the competence of all Legionella Personnel on a 6-monthly basis. This information is saved onto the operators' training file and any actions / findings logged in the Legionella Training (IF-161). The audit will be passed to the HSQE Team who will record trends, causes as necessary and determine any actions required. HBE organise Toolbox Talks with all personnel this ensures that they are kept up to date with current best practice procedures. Tool Box Talks are carried out by the field managers and by the water technical manager.
- c) HBE conducts Toolbox Talks with all personnel this ensures that they are kept up to date with current best practice procedures. Training is scheduled to staff when there are any changes to the current Legislation i.e. ACOP L8 and HSG 274 Part 1, 2 and 3 and documented to Legionella Training (IF-161).

3. Control Measures

- a) HBE have a Management system in place to assess the requirements of their clients and to ensure an appropriate program of control measures is designed, implemented, monitored and maintained as detailed in IP-029 Legionella Control Measures, HBE base this program on the L8 standards.
- b) Implementation of all Corrective Actions & Preventative Actions are verified through monitoring of internal audits and the associated OCPA register by the quality manager as stated within IP-014 Corrective & Preventative Action Procedure. As part of HBE ISO 9001:2008 Management System all customer complaints/feedback, audit non - conformances are all trended and all form part of the Management Review Meetings.
- c) The programme of control measures is achieved through an internal LCA audit carried out on IP-023 Internal Audit form completed by the Quality Manager ensuring compliance with the LCA Standard for Service Delivery. All paperwork is held on the HSQE Drive.

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4. Communication and Management

- a) HBE have a Legionella Escalation Procedure IP-034 and Reporting of Emergency Procedure IP-022 which details how HBE will appropriately respond if any systems operating conditions deviate from the control criteria.
- b) The client will complete a Legionella Pre-Work Survey (IP-042) which details the responsible person details (name, telephone number & email address), deputy responsible person details & duty holder details. HBE will communicate with the Client's nominated personnel by email in the event of any necessary actions as detailed in IP-034 Legionella Escalation Procedure. HBE monitor all Legionella Positive Sample Results through the Chemtest portal.
- c) A list of all Clients' nominated personnel along with their details is securely stored on the O Drive (in individual Client folders when provided), on the Hub System and on CRM.
- d) If any significant matters affecting the control of legionellosis which are beyond the responsibilities of the contract are highlighted these are recorded on the Site Visit Report Sheets by the Technicians/ Consultants who will email the appropriate Account Manager who in turn will inform the client as detailed in IP-024 Legionella Account Management Procedure.

5. Record Keeping

- a) HBE have a Legionella Documentation Control & Records Control Procedure IP - 032 which details what records should be kept by HBE & the Client and also where they should be kept, this is communicated to the Client via the formal agreement and the Legionella Quotation templates which specifies which records should be kept by both parties and where they will be held.
- b) HBE have a Legionella Documentation Control & Records Control Procedure IP-032 which details who will be responsible for the maintenance of records, this is communicated to the client through the formal agreement and the Legionella Quotation templates will be instructing that the client maintains all of their records for a period of 6 years and HBE will retain all of their records for 6 years.

6. Reviews

- a) HBE has a Legionella Review Program in place which allows both parties to formally review on a monthly / 3 monthly / 6 monthly / annual basis all aspects of the agreement covering system Management and the control of legionellosis to include customer training needs, the agenda for such a review is detailed in IP-042 Contract Review & Legionella Pre-Work Survey document.
- b) HBE has a Legionella Risk Assessment Review Program in place which allows risk assessments to be reviewed as per the risk allocation on a relevant basis with all aspects of the agreement covering system Management and the control of legionellosis, the agenda for such a review is detailed in IP-030 Legionella Review Program Procedure.

7. Internal Auditing

- a) HBE conduct a self-audit (IP-023 LCA Internal Audit) to ensure compliance with the Code of Conduct on an annual basis by the Quality Internal Auditor as part of the HBE Quality System. Legionella Audits (Procedures & Onsite Audits) are scheduled on an annual basis on the Audit Schedule, the Quality Internal Auditor conducts the audits IP-015 Internal Audits, the auditee will sign the audit form (IF-042 Internal Audit Report Form) to agree with any findings in the audit. If any non-conformances are raised this will be raised using the corrective action program, this ensures compliance with each of the Legionella Control Association Commitments, a record is saved in the Legionella Control Association Folder on the HBE HSQE Drive.
- b) A corrective action program has been established as part of IP-023 LCA Internal Audit. Any non -conformances will be highlighted by the ISO 9001:2008 non-conformance system procedure IP-014 Non-conformances, Preventative Actions & Corrective Actions using IF-001 Corrective Action Form, the auditee will complete the IF-001 Corrective Action Form and Corrective Action Register, the auditee will work with the appropriate manager to ensure close out of the corrective action. The HSQE Manager/ Deputy Quality Manager will monitor the corrective action register on a monthly basis to ensure a timely close out of all non-conformances, this ensures compliance with each of the Legionella Control Association Commitments, and a record is saved in the Legionella Control Association Folder on the HBE H: Drive (HSQE). The HSQE Manager / Deputy Quality Manager ensures that non-conformances are also discussed at the annual Management review meetings and at the Monthly Quality Meeting; all non-conformances are closed out in a timely manner.

8. Sub-Contractors

- a) HBE has a Management procedure IP-020 Sub-Contractors which ensures that any sub-contractor used by HBE holds an independent registration. HBE does not sub-contract any works covered under the scope of this Statement of Compliance other than Laboratory Services and an External Training Provider, which although not included in the scope support the accredited services.
- b) HBE carry out additional controls on their sub-contractors by getting the sub-contractor to complete a contractor questionnaire and conducts an audit on the sub-contractors on an annual basis as detailed in IP-020 Sub-Contractors to ensure that all activities carried out by our sub-contractors are compliant with the Code of Conduct and any relevant legislation.

9. Distribution of the Code

- d) HBE distribute any new or updated Registration Certificate and/or Code of Conduct to all Clients via the HBE Quotation Templates and HBERM.COM website as detailed in IP-032 Legionella Document & Record Control. A copy of the Registration Certificate is also attached to each Legionella Risk Assessment Report.
- e) HBE also distribute this information to their employees via email and upload to employee Tablets. This information is also stored on the O-Drive - O:\Legionella Guidance, One Drive & Google drive

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Change Record

Version No:	Nature of Change:	Date Ratified:	Ratified By:
14	<ul style="list-style-type: none">rewrite section 1.c of the document (SoC) to detail in which quotation templates the respective responsibilities for each requirement are detailed and as to what is required to form a formal agreement.rewrite the document (SoC) to reflect current practice of utilising non LCA registered organisations for training.remove the reference to "Code of Conduct" within the document.amend document (SoC) detailing how new and existing clients receive a copy of the Code of Conduct and Certificate of Registration or are informed that the current documents are available on their website.	20/07/2016	LVR/ST
15	<ul style="list-style-type: none">Removed references of IF-151 and changed to IF-161. Updates to roles of staff. Changed document control to rear of the document.	16/05/2017	LVR
16	<ul style="list-style-type: none">Updated Section 6	9/08/2017	LVR/MC